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Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods**

Geneva, 13-23 September 2011

Item 6 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals**Chapter 3.4, Marking of wagons, transport units and
containers carrying limited quantities****Transmitted by the Government of Sweden^{1,2}***Summary*

Explanatory summary:	It is not clear under what circumstances the provisions concerning marking of wagons, transport units and containers in section 3.4.13 (a) and (b) admit the marking foreseen for limited quantities to be replaced by orange-coloured plates.
Action to be taken:	Add some clarifying text in section 3.4.13.
Related documents:	ECE/TRANS/WP.15/2010/17 (Switzerland), ECE/TRANS/WP.15/208, paras. 32, 33, 34 (Report of the 89 th session of WP.15)

¹ In accordance with the programme of work of the Inland Transport Committee for 2010–2014 (ECE/TRANS/208, para.106, ECE/TRANS/2010/8, programme activity 02.7 (c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2011/48.

Introduction

1. According to RID/ADR section 3.4.13 (a) and (b), wagons and transport units or containers with a maximum mass exceeding 12 tonnes carrying dangerous goods in limited quantities shall be marked in accordance with 3.4.15. However, this marking is not required for transport units that already have been provided with orange-coloured plates in accordance with 5.3.2 or for wagons and containers already provided with placards in accordance with 5.3.1.

2. During the 89th session of WP.15 a proposal from Switzerland (2010/17) concerning vehicles carrying limited quantities was on the agenda. During the discussions it was made clear that it is only permitted to display orange coloured plates when a transport unit contains goods which are not exempted under section 1.1.3. In case the not exempted goods are unloaded during the transport chain orange-coloured plates shall be removed or covered and the transport unit shall be marked with the “LQ-markings”. At that meeting it was also noted that the French and the English wording in ADR 3.4.13 differed:

“(a) Les unités ... doivent porter un marquage conforme au 3.4.15 à l’avant et à l’arrière, sauf s’ils portent déjà une signalisation orange conformément au 5.3.2.”

“(b) Les conteneurs ... doivent porter un marquage conforme au 3.4.15 sur les quatre côtés, sauf s’ils portent déjà des plaques-étiquettes conformément au 5.3.1. »

“(a) Transport units ... shall be marked in accordance with 3.4.15 at the front and at the rear except when orange-coloured plate marking is displayed in accordance with 5.3.2.”

“(b) Containers ... shall be marked in accordance with 3.4.15 at the front and at the rear except when orange-coloured plate marking is displayed in accordance with 5.3.2.”

3. According to the decision taken by WP.15, the English text will be corrected in accordance with the French wording. However, even with the word “already” inserted in the text it will still leave some room for interpretation. E.g. if a transport unit at the start of the journey is loaded with both LQ and other dangerous goods, it is permitted to only mark the unit with the orange coloured plates. If the other dangerous goods is unloaded during carriage and only limited quantities remains on the transport unit, the orange coloured plates shall be removed or covered. Thus, the LQ-marking shall be displayed on the transport unit. However, as the text is worded it could be understood that it is allowed to keep the orange coloured plates as long as the transport unit has been loaded with goods that requires orange-coloured plates during a part of the transport chain.

4. The Government of Sweden have had indications from the enforcement bodies that it is, in a transport as exemplified above, commonly understood that the provision allows for either LQ-markings or orange-coloured plates.

5. To eliminate the risk for misunderstanding, the Government of Sweden proposes to clarify the text in section 3.4.13 (a) and (b).

Proposal

Amend the text in ADR, section 3.4.13 as follows (changes stricken out or underlined):

“(a) Transport units with a maximum mass exceeding 12 tonnes carrying packages with dangerous goods in limited quantities shall be marked in accordance

with 3.4.15 at the front and at the rear except when orange-coloured plate marking is ~~already displayed~~, in accordance with 5.3.2, is required for goods loaded on the transport unit.

(b) Containers carrying dangerous goods in limited quantities, on transport units with a maximum mass exceeding 12 tonnes, shall be marked in accordance with 3.4.15 on all four sides except when placards, ~~are already affixed~~ in accordance with 5.3.1, are required for goods loaded on the transport unit.”

Amend the text in RID, section 3.4.13 as follows (changes stricken out or underlined):

“(a) Wagons carrying packages with dangerous goods in limited quantities shall be marked in accordance with 3.4.15 on both sides except when placards ~~are already affixed~~, in accordance with 5.3.1, are required for goods loaded on the wagon.

(b) Large containers carrying packages with dangerous goods in limited quantities shall be marked in accordance with 3.4.15 on all four sides except when placards, ~~are already affixed~~ in accordance with 5.3.1, are required for goods loaded on the transport unit. If the marking affixed to the large containers is not visible from outside the carrying wagon, the same marking shall also be affixed to both sides of the wagon.”
